

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**GREGORY THOMAS BERRY, et al.  
on behalf of themselves and all others  
similarly situated**

**Plaintiffs,**

**v.**

**Case No. 3:11cv754**

**LEXISNEXIS RISK &  
INFORMATION ANALYTICS  
GROUP, INC., et al.,**

**Defendants.**

**JOINT MOTION FOR PRELIMINARY APPROVAL  
OF PROPOSED SETTLEMENT**

Plaintiffs Gregory Thomas Berry, Summer Darbonne, Rickey Millen, Shamoon Saeed, Arthur B. Hernandez, Erika A. Godfrey and Timothy Otten, individually and on behalf of all others similarly situated, (“Plaintiffs”) and Defendants LexisNexis Risk & Analytics Group, Inc., Seisint, Inc., and Reed Elsevier Inc. (“Defendants”) move for preliminary approval of the proposed settlement of this action, in which they request this Court to enter an Order (1) granting preliminary approval of the proposed settlement; (2) conditionally certifying two classes for settlement purposes only pursuant to Fed. R. Civ. P. 23(b)(2) and Fed. R. Civ. P. 23(b)(3); (3) appointing Class Counsel for the settlement classes; (4) approving the proposed notice plans for the settlement classes; (5) appointing Kinsella Media and Rust Consulting, Inc. as the Settlement Administrators for the Rule 23(b)(2) and Rule 23(b)(3) settlement classes, respectively; and (6) scheduling the Court’s final fairness hearing for the proposed settlement.

Respectfully submitted,

/s/

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LexisNexis Risk Data Management, Inc.

**CERTIFICATE OF SERVICE**

I certify that on the 15th day of March, 2013, I electronically filed the foregoing Joint Motion for Preliminary Approval of Proposed Settlement with the Clerk of Courts using the CM/ECF system, which will send notification of such filing to CM/ECF participants, and I hereby certify that I have mailed by United States Postal Service the document to the non-CM/ECF participants:

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